

**BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001**

**First-Class Mail and Periodicals  
Service Standard Changes, 2021**

**Docket No. N2021-1**

**DOUGLAS F. CARLSON  
INTERROGATORIES AND REQUESTS FOR PRODUCTION  
OF DOCUMENTS TO UNITED STATES POSTAL SERVICE  
WITNESS ROBERT CINTRON (DFC/USPS-T1-1-15)**

**May 3, 2021**

Pursuant to 39 C.F.R. § 3010.311, I hereby submit interrogatories and requests for production of documents to United States Postal Service witness Robert Cintron.

If the witness is unable to provide a complete, responsive answer to a question, I request that the witness redirect the question to a witness who can provide a complete, responsive answer. In the alternative, I request that the question be redirected to the Postal Service for an institutional response.

If data requested are not available in the exact format or level of detail requested, any data available in (1) a substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

The production of documents requested herein should be made by photocopies attached to responses of these interrogatories.

The term “documents” includes, but is not limited to: letters, telegrams, memoranda, electronic-mail messages, reports, studies, newspaper clippings, speeches, testimonies, pamphlets, charts, tabulations, and workpapers. The

term “documents” also includes other means by which information is recorded or transmitted, including printouts, microfilms, cards, discs, and tapes and recordings used in data processing together with any written material necessary to understand or use such punch cards, discs, tapes, or other recordings.

“All documents” means each document, as defined above, that can be located, discovered, or obtained by reasonably diligent efforts, including, without limitation, all documents possessed by (a) you or your counsel or (b) any other person or entity from whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand.

“Communications” includes, but is not limited to, any and all conversations, meetings, and discussions and any other occasion for verbal exchange, whether in person or by telephone, as well as all documents, including but not limited to letters, memoranda, telegrams, cables, or electronic mail.

“Relating to” means discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. The term “workpapers” shall include all backup material, whether prepared manually, mechanically, or electronically, without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness’ responses and should “show what the numbers were [and] what numbers were added to other numbers to achieve a final result.” The witness should “prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results.” Docket No. R83-1, Tr. 10/2795-96. Where the arithmetic manipulations were performed by an electronic digital computer with internally stored instructions and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

Please especially note that if you are unable to provide any of the requested documents or information, as to any of the interrogatories, please provide an explanation for each instance in which documents or information cannot be provided or have not been provided.

Respectfully submitted,

Dated: May 3, 2021

DOUGLAS F. CARLSON

**DFC/USPS-T1-1.** Please refer to your testimony at page 6, lines 2–5. Please identify all changes that the Postal Service made to its plan that is the subject of this docket in response to feedback that the public provided during the pre-hearing conference.

**DFC/USPS-T1-2.** Please refer to your testimony at page 9. Please provide a comparison of on-time performance between air and surface transportation from FY 2011 to FY 2018. You may provide the data on an annual basis or a quarterly basis.

**DFC/USPS-T1-3.** Please refer to your testimony at page 12, lines 9–14. Please explain in detail why the schedules of commercial air carriers frequently would not allow the Postal Services to meet current service standards for mail to and from Alaska, Hawaii, and offshore territories.

**DFC/USPS-T1-4.** Please refer to your testimony at page 16.

- a. Please explain, with reference to transportation and processing, why the Postal Service is changing the service standard to four days for First-Class Mail originating in and destined to the 995 and 996 ZIP Code area.
- b. Please explain, with reference to transportation and processing, why the Postal Service is changing the service standard to four days for First-Class Mail originating in and destined to the 995–997 ZIP Code area.
- c. Please explain, with reference to transportation and processing, why the Postal Service is changing the service standard to four days for First-Class Mail originating in and destined to the 998 and 999 ZIP Code areas.
- d. Please explain, with reference to transportation and processing, why the Postal Service is changing the service standard to four days for First-Class Mail between the 995–997 ZIP Code areas and the 998–999 ZIP Code areas.

**DFC/USPS-T1-5.** Please explain the extent to which labeling list L201 provides an accurate representation, for the purpose of understanding issues in this docket, of the current reach of surface transportation for First-Class letters and flats.

**DFC/USPS-T1-6.** In labeling list L201, please explain whether surface transportation is, in fact, used for First-Class Mail originating in ZIP Codes 998 and 999 and destined outside ZIP Codes 998 and 999.

**DFC/USPS-T1-7.** Please refer to your testimony at page 18, lines 13–16.

- a. Please confirm that the changes in processing operations implemented as a result of the elimination of overnight delivery for single-piece First-Class Mail caused or exacerbated the challenges in meeting delivery standards for two-day inter-SCF First-Class Mail. If you do not confirm, please explain.
- b. Please provide the critical entry time for two-day inter-SCF First-Class Mail prior to the elimination of overnight delivery for single-piece First-Class Mail. If you cannot provide a general answer, please confirm that the critical entry time was later than 8:00 AM.

**DFC/USPS-T1-8.** Please refer to your testimony at pages 18–19. Please provide the actual critical entry time for each processing facility.

**DFC/USPS-T1-9.** Please refer to your testimony at page 26, lines 6–11. Please provide examples — and all such instances if practicable — in which the Postal Service transports mail or packages by air because volume is too low for surface transportation or surface transportation would be too time consuming. In your response, please specify the class of mail involved for each instance.

**DFC/USPS-T1-10.** Please refer to your testimony at page 29, lines 23–24 and page 30, line 1. Please explain the extent to which the schedule you described does not apply to originating mail processing facilities that are located far from airports.

**DFC/USPS-T1-11.** Please refer to your testimony at page 29, lines 23–24 and page 30, line 1. For each processing facility listed below, please explain how First-Class Mail and Priority Mail originating at that facility connect with the air transportation network.

- a. Eureka CA
- b. Medford OR
- c. Missoula MT
- d. Great Falls MT
- e. Rapid City SD

**DFC/USPS-T1-12.** Please identify all instances in the contiguous 48 states in which the Postal Service uses air transportation between processing facilities to achieve two-day delivery for First-Class Mail.

**DFC/USPS-T1-13.** Please refer to your testimony at page 31, fn. 21. Please explain which processes underlying the first sentence will change as described in the second sentence.

**DFC/USPS-T1-14.** Please refer to your testimony at page 35, lines 19–21. Please provide all studies, analyses, documents, and other information that participants and the Commission should consider as supporting your contention that First-Class Mail will provide adequate service to customers if the service standard is extended by one or two days.

**DFC/USPS-T1-15.** Please provide an overview of the air transportation network for First-Class Mail, Priority Mail, and Priority Mail Express that describes the air carriers that serve each mail class and the approximate proportion of the total volume that is allocated to each carrier.